

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
WESTERN DIVISION**

**HAROLD HARRIS; PASTOR ROBERT
TIPTON, JR.; DELTA SIGMA THETA
SORORITY, INC.; AND DESOTO COUNTY
MS NAACP UNIT 5574**

PLAINTIFFS

VS.

CIVIL NO.: 3:24-CV-00289-GHD-RP

**DESOTO COUNTY, MISSISSIPPI; DESOTO
COUNTY BOARD OF SUPERVISORS;
DESOTO COUNTY ELECTION
COMMISSION; and DALE THOMPSON in her
official capacity as DeSoto County Circuit Clerk**

DEFENDANTS

RESPONSE IN OPPOSITION TO MOTION TO EXPEDITE TRIAL

Defendants Defendant DeSoto County, Mississippi, DeSoto County Board of Supervisors, DeSoto County Election Commission, and Dale Thompson, sued in her official capacity as Circuit Clerk for DeSoto County (collectively “Defendants”) file this Response in Opposition to Plaintiffs’ Motion to Expedite Trial Date [74], stating the following in support:

1. Plaintiffs have moved to expedite the trial date but their motion is nothing more than a thinly veiled request to amend the Court’s Case Management Order [67]. As such, Plaintiffs were required to demonstrate that good cause supports amending the Case Management Order [67], but they failed to even address good cause. Even so, an analysis of the four prongs courts apply for determining whether good cause supports an amendment to the Case Management Order [67] makes clear Plaintiffs cannot establish good cause to expedite the trial date.

2. Defendants offer the following exhibits in support of their response to Plaintiffs’ Motion [74]:

Exhibit 1 – Feb. 5, 2025, E-mail from Hessel to Chambers (3:25 p.m.); and

Exhibit 2 – Feb. 5, 2025, E-mail from Hurst to Chambers (3:39 p.m.).

3. For these reasons and those explained in the contemporaneously filed memorandum in support of this Response, Defendants respectfully request Plaintiffs Motion [74] be denied.

Dated: March 20, 2025.

Respectfully submitted,

PHELPS DUNBAR LLP

/s/ Nicholas F. Morisani

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that on March 20, 2025, I electronically filed this response with the Clerk of the Court using the ECF system, which sent notification of such filing to all ECF counsel of record in this action.

/s/ Nicholas F. Morisani
Nicholas F. Morsani